

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	:	Bankruptcy Case No. 19-22715-CMB
	:	
5171 Campbells Land Co. Inc.,	:	Chapter 11
	:	
Debtor.	:	Related to Doc. No. 149
_____	:	
	:	
5171 Campbells Land Co. Inc.,	:	
	:	
Movant,	:	
	:	
v.	:	
	:	
ASCENTIUM CAPITAL, LLC, IEMFS,	:	
Ltd. d/b/a GSF FINANCIAL, HITACHI	:	
CAPITAL AMERICA CORP., TRI	:	
STATE EQUIPMENT CO., INC.,	:	
WESBANCO BANK, INC., STORE	:	
CAPITAL ACQUISITIONS, LLC,	:	
STORE MASTER FUNDING XIII, LLC,	:	
US FOOD, INC., VISION FINANCIAL	:	
GROUP, INC., PENNSYLVANIA	:	
DEPARTMENT OF REVENUE, THE	:	
NEW YORK DEPARTMENT OF	:	
TAXATION, THE OHIO	:	
DEPARTMENT OF TAXATION AND	:	
THE INTERNAL REVENUE SERVICE,	:	
	:	
Respondents.	:	
_____	:	

OBJECTION TO EMERGENCY MOTION FOR SALE OF PERSONALTY

NOW COMES Marc Group, LLC, a Pennsylvania limited liability company, by its attorney, Joseph E. Hudak, Esq., and files this Objection to Emergency Motion for Sale of Personalty, and in support thereof respectfully submits as follows:

1. Marc Group, LLC, incorporates herein by reference its Motion to Dismiss Bankruptcy. Marc Group, LLC holds all equity in 5171 Campbells Land Co., LLC. An issue must be resolved

as to how 5171 Campbells Land Co., LLC relates to 5171 Campbells Land Co. Inc. The transfer of assets in the bankruptcy case of *In re Unique Ventures Group, LLC* at No. 17-20526-TPA was to 5171 Campbells Land Co., LLC. It is believed that the assets that the Debtor seeks to sell are in effect the property of Marc Group, LLC and cannot be sold by the Debtor. Notice is hereby given to any potential buyer of assets purportedly owned by the Debtor.

2. Marc Group LLC has a claim to ownership to all of the assets that the Debtor seeks to sell. Again, Marc Group, LLC, incorporates herein by reference its Motion to Dismiss Bankruptcy. Although ownership of all of the assets that the Debtor seeks to sell might already be held by Marc Group, LLC, Marc Group, LLC nonetheless is willing and able to pay the same sale price currently proposed by the Debtor for the sale of those assets. Fairness requires that the Debtor's proposed sale of personalty be offered first to Marc Group, LLC because Marc Group, LLC already has a claim to ownership, indeed might already own the subject personalty, and Marc Group, LLC is willing and able to pay the same sale price currently proposed by the Debtor for the sale of those assets.

WHEREFORE, Marc Group, LLC respectfully requests that the Debtor's proposed sale of personalty be offered first to Marc Group, LLC or, in the alternative, stayed until resolution of Marc Group LLC's Motion to Dismiss Bankruptcy.

/s/ Joseph E. Hudak

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